

**Carl Post, OSB No. 061058**

[carlpost@lawofficeofdanielsnyder.com](mailto:carlpost@lawofficeofdanielsnyder.com)

**John Burgess, OSB No. 106498**

[johnburgess@lawofficeofdanielsnyder.com](mailto:johnburgess@lawofficeofdanielsnyder.com)

Law Offices of Daniel Snyder

1000 S.W. Broadway, Suite 2400

Portland, Oregon 97205

Telephone: (503) 241-3617

Facsimile: (503) 241-2249

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**CHRISTOPHER CALDWELL, SHANNON CLARK, JACEY HOPPERT, ALEX KULAKEVICH, JOSHUA KRUMWEIDE, DAVID LARUE, ALEXEI LAWLER, ANTHONY MATHIS, RAUL MARQUEZ, LUIS NAVARRETE, VALENTINE PASCU, ANDREW PIERSON, CHRISTOPHER PITMAN, TRACY RASBERRY, JEFF ROBERTS, CHRISTOPHER SELIGER, ANTHONY TAYLOR, and MARK WICKLUND, individually and on behalf of those similarly situated,**

Case No. 3:21-cv-501-AA

**JOINT MOTION TO STAY DEADLINES**

Plaintiffs,

v.

**MULTNOMAH COUNTY**, a political subdivision of the state of Oregon; **MICHAEL REESE**, Multnomah County Sheriff, **STEVEN ALEXANDER**, Chief Deputy of Corrections, **KURTISS MORRISON**, Facility Commander, **JEFFERY WHEELER**, Facility Commander, and **DEPUTY CASTRO-RAMOS**

Defendants.

**LR 7.1(a) CERTIFICATION OF CONFERRAL**

In accordance with LR 7-1(a), the parties have conferred regarding this motion and both parties agree to the following.

**MOTION**

The parties in the above-captioned action jointly move the Court for an order staying this case pending an appellate decision in *Maney v. Brown*, USDC Case No. 6:20-cv-00570-SB. This issue was discussed at the hearing on June 17, 2024 and the appeal remains pending. According to the docket for Ninth Circuit Court of Appeals Case Number 24-2715, the answering brief is currently due January 17, 2025.

**CONCLUSION**

For the foregoing reasons, the parties respectfully request that the Court enter an order staying the deadlines set forth in the current case management and resetting them after the appeal is decided.

DATED: January 7, 2025

*s/ Carl Post*  
**Carl Post**, OSB No. 061058  
[carlpost@lawofficeofdanielsnyder.com](mailto:carlpost@lawofficeofdanielsnyder.com)  
**John Burgess**, OSB No. 106498  
[johnburgess@lawofficedanielsnyder.com](mailto:johnburgess@lawofficedanielsnyder.com)  
 Law Offices of Daniel Snyder  
 1000 SW Broadway, Suite 2400  
 Portland, OR 97205  
 (503) 241-3617  
*Attorneys for Plaintiffs*

*s/ Christopher Gilmore*  
**Christopher Gilmore**, OSB No. 980570  
 Multnomah County Attorney's Office  
 501 SE Hawthorne Blvd., Ste. 500  
 Portland, OR 97214  
 Tel: 503-988-3138  
[chris.gilmore@multco.us](mailto:chris.gilmore@multco.us)  
*Attorneys for Defendants*